

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

No. 24-cv-6563 (LJL)

RUDOLPH W. GIULIANI,

Defendant.

DECLARATION OF M. ANNIE HOUGHTON-LARSEN REGARDING PLAINTIFFS'
LETTER UPDATE ON PLAINTFFS' MOTION FOR CIVIL CONTEMPT AND
SANCTIONS

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.
2. I submit this declaration in support of Plaintiffs' Letter Update on Plaintiffs' Motion for Civil Contempt and Sanctions, ECF No. 106, *Freeman v. Giuliani*, 24-cv-6563 (S.D.N.Y. Dec. 5, 2024).
3. On November 1, 2024, Plaintiffs' counsel received an email from Defendant's counsel on which they copied Defendant's "protonmail" email address. A true and correct copy of that email is attached hereto as **Exhibit A**.
4. On November 1, 2024, Plaintiffs' served Defendant Plaintiffs' First Set of Document Requests on Defendant Rudolph W. Giuliani ("First RFPs") in the above-captioned action. A true and correct copy of Plaintiffs' First RFPs is attached hereto as **Exhibit B**.

5. On December 5, 2024, Plaintiffs' counsel received an email from Mr. Giuliani regarding another matter from his "protonmail" email address. A true and correct copy of that email is attached hereto as **Exhibit C**.

6. On December 8, 2024, Mr. Giuliani's counsel served Defendant's response to Plaintiffs' First RFPs. A true and correct copy of Defendant's response is attached hereto as **Exhibit D.1** and **Exhibit D.2**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 9, 2024.

s/ M. Annie Houghton-Larsen

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